

Donald S. Zakarin  
[dzakarin@pryorcashman.com](mailto:dzakarin@pryorcashman.com)  
Ilene S. Farkas  
[ifarkas@pryorcashman.com](mailto:ifarkas@pryorcashman.com)  
Andrew M. Goldsmith  
[agoldsmith@pryorcashman.com](mailto:agoldsmith@pryorcashman.com)

**PRYOR CASHMAN LLP**

7 Times Square  
New York, New York 10036-6569

*Attorneys for Defendant Edward Christopher Sheeran, Atlantic Recording Corporation and Sony/ATV Music Publishing LLC*

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

KATHRYN TOWNSEND GRIFFIN, HELEN MCDONALD, and THE ESTATE OF CHERRIGALE TOWNSEND,

*Plaintiffs,*

-against-

EDWARD CHRISTOPHER SHEERAN, p/k/a ED SHEERAN, ATLANTIC RECORDING CORPORATION, d/b/a ATLANTIC RECORDS, SONY/ATV MUSIC PUBLISHING, LLC, and WARNER MUSIC GROUP CORPORATION, d/b/a ASYLUM RECORDS

*Defendants.*

ECF CASE

17-cv-5221 (RJS)

**NOTICE OF MOTION**

**PLEASE TAKE NOTICE**, that upon the annexed Declaration of Ilene S. Farkas dated July 27, 2018, the exhibits annexed thereto, the Declaration of Dr. Lawrence Ferrara dated July 27, 2018, the Declaration of Audrey Ashy dated July 27, 2018, the Declaration of Jake Gosling dated July 26, 2018, the Declaration of Amy Wadge dated June 28, 2018, the accompanying Rule 56.1 Statement of Material Facts and the accompanying Memorandum of Law, defendants Edward Christopher Sheeran, p/k/a Ed Sheeran, Atlantic Recording Corporation d/b/a Atlantic Records and Sony/ATV Music Publishing LLC (collectively, the “Defendants”) shall move this Court, before the Honorable Richard J. Sullivan at the

Thurgood Marshall United States Courthouse, Courtroom 905, 40 Foley Square, New York, New York, 10007, on September 19, 2018 at 9:30 a.m., or as soon thereafter as counsel may be heard, for an Order, pursuant to Fed. R. Civ. P. 56, dismissing, in its entirety, the Complaint of plaintiffs dated June 24, 2017 and entering judgment in favor of Defendants.

The reasons and grounds for this motion are more fully described in the accompanying papers.

Oral argument shall be held on a date and at a time designated by the Court.

Dated: New York, New York  
July 27, 2018

PRYOR CASHMAN LLP

By:/s/ *Ilene S. Farkas*  
Donald S. Zakarin  
[dzakarin@pryorcashman.com](mailto:dzakarin@pryorcashman.com)  
Ilene S. Farkas  
[ifarkas@pryorcashman.com](mailto:ifarkas@pryorcashman.com)  
Andrew M. Goldsmith  
[agoldsmith@pryorcashman.com](mailto:agoldsmith@pryorcashman.com)  
7 Times Square  
New York, New York 10036-6569  
Telephone: (212) 421-4100  
Facsimile: (212) 326-0806

*Attorneys for Defendants*

TO:

Frank & Rice, P.A.  
325 West Park Avenue  
Tallahassee, Florida 32301  
(850) 629-4168

*Attorneys for Plaintiffs*